

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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SPECIAL SERVICES FEES AND CLASSIFICATIONS, 1996)

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. MC96-3

NASHUA PHOTO INC., MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC.  
FIFTH FOLLOW-UP INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO UNITED STATES POSTAL SERVICE (NMS/USPS-93-98)  
(November 15, 1996)

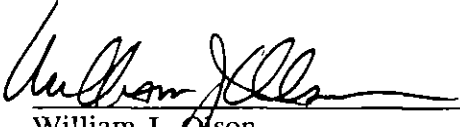
Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Nashua Photo Inc., Mystic Color Lab, and Seattle FilmWorks, Inc. hereby submit follow-up interrogatories and document production requests. Certain of these interrogatories and document production requests relate to studies of BRM and BRMAS which were being conducted by the Postal Service during the earlier stages of this docket (*see, e.g.*, references to studies contained in USPS Statement on Plans for BRM Reform, July 19, 1996; USPS Opposition to Nashua/Mystic Proposal to Enlarge Scope of Proceeding, July 24, 1996, p. 5; USPS Motion for Reconsideration of PRC Order No. 1129, August 16, 1996, p. 2; USPS Response to PRC Order No. 1131, August 23, 1996, p. 3; USPS Response to NM/USPS-67(b), September 20, 1996; USPS Response to NM/USPS-8, September 23, 1996; USPS Response to NM/USPS-26, September 23, 1996.) Supplemental answers from the Postal Service would also be appropriate pursuant to Rule 25(e), but none have been filed to date.

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RRP

If necessary, please redirect interrogatories and/or requests to a more appropriate  
Postal Service witness.

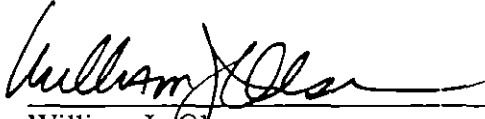
Respectfully submitted,

  
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Counsel for Nashua Photo Inc., Mystic Color Lab,  
and Seattle FilmWorks, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all participants of  
record in this proceeding in accordance with Section 12 of the Rules of Practice.

  
\_\_\_\_\_  
William J. Olson

November 15, 1996

**NMS/USPS-93.**

a. Based on the results of your recent surveys/studies and the best information available to the Postal Service, please provide your best estimate for the Base Year of:

(i) the number of mailers that have "reverse manifest" systems approved by the Postal Service for estimating BRM postage and fees;

(ii) the lines of business of these mailers;

(iii) the number of postal facilities that administer these "reverse manifest" agreements; and

(iv) the percentage of all BRM for which "reverse manifest" systems is used to compute postage and fees due on BRM.

b. See the Postal Service's response to NM-USPS-27, and please identify the "customers," "plants" and "agreements" referenced therein.

**NMS/USPS-94.**

Based on the results of your recent surveys/studies and the best information available to the Postal Service, please provide the Postal Service's best estimate for the Base Year of:

(i) the number of mailers for which "weight conversion" or weight averaging is used to compute postage and fees due on BRM mail;

(ii) the lines of business of these mailers;

(iii) the number of postal facilities that administer these "weight conversion" or weight averaging systems; and

(iv) the percentage of all BRM for which "weight conversion" or weight averaging is used to compute postage due on BRM in the Base Year.

**NMS/USPS-95.**

Please provide as a library reference a copy of all data and surveys (including but not limited to plants, accounts, customers, volume received, seasonality of volume flows and usage) pertaining to Business Reply Mail completed thus far during 1996. For such information as is proprietary/confidential, please provide this information pursuant to a non-disclosure agreement.

**NMS/USPS-96.**

- a. Please identify all cost studies pertaining to Business Reply Mail, including BRMAS, which have been undertaken, but which are not yet completed, along with target completion dates.
- b. Please identify all cost studies pertaining to Business Reply Mail, including BRMAS, which have been undertaken and completed thus far during 1996, and provide as a library reference copies of such studies.

**NMS/USPS-97.**

Based on the results of your recent studies and the best information available to the Postal Service, what is the Postal Service's best estimate of the average unit cost both in Base Year 1996 and Test Year 1996 to process: (i) BRMAS mail on automation; (ii) individual pieces of BRM manually; and (iii) individual pieces of BRMAS manually?

**NMS/USPS-98.**

Please provide any supplemental or revised information learned or generated since responses were previously filed by the Postal Service that would be responsive to all Nashua/Mystic and Nashua/Mystic/Seattle Interrogatories, specifically including NM/USPS-28, 29, 30, 32, 33 and 35.